

FCC 17-26, Reply to comments  
CG Docket No. 10-51  
CG Docket No. 03-123

Interpreted wire-fraud calls can not be "functionally equivalent". The deaf user does not hear or see the criminal caller on the video screen. The deaf user sees only a VRS interpreter on the video screen. The interpreter is professionally dressed and is seen working in what appears to be a legitimate business setting. The deaf user does not receive all audible clues that are warning signs of a scam because the VRS interpreter cannot completely convey such clues in an equivalent way to the deaf user. An interpreter cannot render visible all the criminal caller's audible traits that would be warning signs to a person who can hear. The hearing world has immediate access to such audible "red flags". The deaf world does not.

If an audio caller is successful in committing wire fraud through VRS, it has likely resulted, at least in part, from a VRS interpreter being unable to become, look like, or accurately convey the culmination of telltale audible clues emanating from the criminal caller and his/her environment. The multiplicity of audible clues accompanies the words spoken by a criminal caller and comprises a substantial but ultimately missing part of an interpreted call.

Wire fraud being conducted through publicly funded businesses is shameful. Criminals have found a convenient means to target a vulnerable population by taking advantage of ambiguity created when using VRS for such calls. Rather than *requiring* that wire-fraud calls be processed by VRS interpreters, the FCC will make better use of public TRS funds by finding ways to *prevent* VRS facilities from being used by callers to further illegal enterprises.

Katie Heidenreich  
June 26, 2017